



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 16 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL NO.: 7009 1680 0000 7677 8855**  
**RETURN RECEIPT REQUESTED**

Mr. Wade Miller  
Corporate Compliance and Ethics  
Target Corporation  
1000 Nicollet Mall, TPN 1024  
Minneapolis, Minnesota 55401

Re: Notice of Violation  
EPA I.D. No.: MND 120 016 480

Dear Mr. Miller:

On June 10, 2014 a representative of the U.S. Environmental Protection Agency inspected Target Store #T2200 (#T2200 or the facility) located in Fridley, Minnesota. The purpose of the inspection was to evaluate #T2200's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on EPA's June 10, 2014 inspection that included personal observations made by the inspector, and a review of records and information provided by Target Corporation and #T2200, EPA finds that #T2200 violated certain requirements of the Minnesota Rules (Minn. R.) and the United States Code of Federal Regulations (CFR).

Specifically, we found that #T2200 was in noncompliance with and in violation of the following requirement:

1. A small quantity handler of universal waste must label or mark clearly each lamp or a container or package in which such lamp(s) is contained with one of the following : "Universal Waste – Lamp(s)", or "Waste Lamp(s)" or "Used Lamps". See Minn. R. 7045.1400 and 40 CFR § 273.14 (e). At the time of the inspection #T2200 had not labeled or marked clearly three (3) containers or packages of lamps, bulbs and lamp ballasts with one of the following : "Universal Waste – Lamp(s)", or "Waste Lamp(s)" or "Used Lamps".

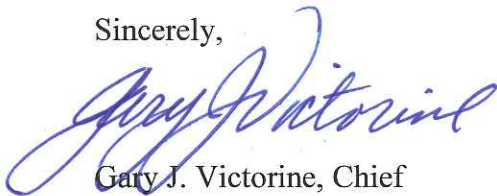


At the time of the inspection, #T2200 labeled or marked clearly one container or package of lamps, bulbs and lamp ballasts with one of the following : "Universal Waste – Lamp(s)" , or "Waste Lamp(s)" or "Used Lamps". On June 11, 2014, Target Corporation and #T2200 provided documentation that it had labeled or marked clearly all containers or package of lamps, bulbs and lamp ballasts with one of the following : "Universal Waste – Lamp(s)" , or "Waste Lamp(s)" or "Used Lamps". Based on that information, Target Corporation and #T2200 has established compliance with the requirements of Minn. R. 7045.1400 and 40 CFR § 273.14 (e).

This letter is to inform you that EPA does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other statutes. EPA appreciates Target Corporation's and Target Store #T2200's cooperation.

If you have any questions or concerns regarding this letter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: John Elling, Minnesota PCA (John.Elling@state.mn.us)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Target Store #T2200

**EPA ID No.:** MND 120 016 480

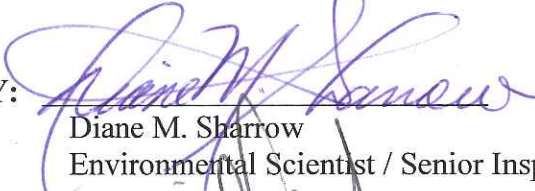
**LOCATION ADDRESS:** 755 53<sup>rd</sup> Avenue, Fridley, Minnesota 55421

**NAICS CODE(S):** 452112 Discount Department Stores

**DATE OF INSPECTION:** 11 June 2014

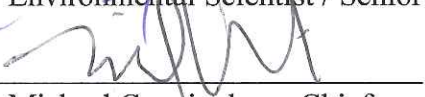
**EPA INSPECTOR:** Diane M. Sharrow  
Environmental Scientist / Senior Inspector  
Mail Code LR-8J  
Land and Chemicals Division  
RCRA Branch  
Compliance Section 1  
(312) 886-6199 Direct  
(312) 692-2906 Facsimile  
Sharrow.diane@epa.gov

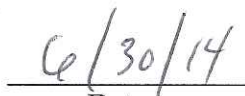
**PREPARED BY:**

  
Diane M. Sharrow  
Environmental Scientist / Senior Inspector

  
Date

**REVIEWED BY:**

  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch

  
Date



## INTRODUCTION

### Purpose of Inspection

The purpose of the inspection was to conduct an unannounced Compliance Evaluation Inspection (CEI) at Target Store #T2200 (#T2200), located at 755 53<sup>rd</sup> Avenue, Fridley, Minnesota 55330. The CEI was conducted to evaluate #T2200's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), and the state and federal regulations related to the management of solid waste, hazardous waste, used oil and universal waste.

### Background

A CEI to evaluate compliance with certain provisions of the RCRA, including those regulations related to the management of hazardous waste, has never been conducted at #T2200. Target Corporation operates a large number of discount department stores including #T2200. Target Corporation notified the United States Environmental Protection Agency (EPA) that #T2200 was a conditionally exempt small quantity generator (CESQG) of hazardous waste on or about March 7, 1988, and identified itself as an episodic large quantity generator (LQG) of hazardous waste on February 3, 2012. #T2200 most recently identified their hazardous waste on their 2013 Biennial Report as follows: Aerosols as discarded chemicals (D001, D028 and D035); compressed flammable gases in discarded lighters and LPG (D001); discarded corrosive solids and liquids in lab-packs (D002); discarded flammable liquids and solids in lab-packs (D001, etc.); broken mercury containing fluorescent lamps (D009); discarded oxidizing liquids and solids in lab-packs (D001); discarded pharmaceutical P-Listed wastes (P001, P042, P075 and P081); discarded prescription toxic liquids and solids (D001, etc.); discarded photo processing chemicals (D002); and discarded pesticides (D016 and U279).

## OPENING CONFERENCE

I arrived at Target Store #T2200 at approximately 7:15 AM CST. I drove around the rear of the store and then parked my vehicle in the front parking lot. I exited my vehicle and photographed the front of the building (see Photograph 1). The store was not open to the public, but I observed several employees push a buzzer to be admitted. I pushed the buzzer and was met at the front doors by a store employee. I identified myself to the employee, presented my enforcement credentials and a business card. I explained that the purpose of my visit was to conduct an unannounced CEI, and asked if I could speak to the store manager. The employee asked me to wait while she radioed for the manager.

A few minutes later I was met by Brenda Pawlak, the Store Team Leader. I identified myself to Ms. Pawlak and presented my enforcement credentials. I explained to Ms. Pawlak that the purpose of my visit was to conduct an unannounced CEI at #T200 that included a Records Review as well as a Visual Site Inspection (VSI). She asked me to wait a few minutes while she directed a few employees in order to prepare the store for opening to the public, and to request that staff assist her in escorting me during the CEI.



A few minutes later Ms. Pawlak and I were joined by Darryl Sledge, Executive Team Leader. I identified myself to Mr. Sledge and presented my enforcement credentials. I explained to Mr. Sledge that the purpose of my visit was to conduct an unannounced CEI at #T2200 that included a Records Review as well as a VSI.

I briefly summarized the records that I would be reviewing, and provided Ms. Pawlak with the following documents: the U.S. EPA OECA Small Business Information Sheet; the U.S. EPA Region 5 List of Pollution Prevention Contacts; and pollution prevention information from the Minnesota Pollution Control Agency (Minnesota PCA). I indicated that I would like to conduct the VSI first, and then the Records Review. Ms. Pawlak and Mr. Sledge explained that some of the records were kept at the hazardous waste storage area and some in the front office, and some were kept electronically.

I explained to Ms. Pawlak and Mr. Sledge that I would be taking photographs, but that I would let them know if I was going to take a photograph so that: 1) they could also take a photograph; and 2) they could inform me whether my photograph captured images or information that #T2200 wished to protect by asserting a claim of business confidentiality. I also asked them to verify that my personal safety equipment (steel-toed boots and safety glasses) was adequate. They indicated that my safety equipment was adequate.

### **VISUAL SITE INSPECTION**

Mr. Sledge escorted me to the rear of the store where we passed through merchandise storage. He stopped and introduced me to Bob Benjamin, the Receiving Clerk. I identified myself to Mr. Benjamin and presented my enforcement credentials. A few minutes later we were joined by Logan Arends, Store Facilities Technician. I explained to Mr. Arends that the purpose of my visit was to conduct an unannounced CEI at #T2200 that included a Records Review as well as a VSI.

Mr. Benjamin explained that to me that certain materials at #T2200 are discarded upon return as unwanted, damaged, defective, etc., and sent to him where he determines if they are hazardous waste. He also explained that when certain products are damaged or spilled on the store floor, only managers clean up the materials and place them in a container and send them to him where he makes a determination as to whether the materials could be hazardous waste. He makes these initial waste determinations based on product information Target Corporation has made available in its ESIM System via a PDA that is used to scan UPC codes on containers, which is then verified when the hazardous waste is picked up and lab-packed by the hazardous waste transporter.

Mr. Benjamin explained that all discarded materials are sent to him for sorting (Photograph 4). He then sorts the materials by those that can be donated, those that are non-hazardous waste and those that are hazardous waste and places them into closed and labelled containers (see Photograph 2). He explained further that hazardous wastes are individually bagged and labelled (see Photograph 3), and placed in the appropriate satellite accumulation hazardous waste container (see Photograph 5). Mr. Benjamin further stated that these materials are then removed from inventory, and that approximately 20 storage containers like those in Photograph 2 are



generated every 3 to 5 weeks. I noted that there were two hazardous waste containers that were full, labeled and dated and five hazardous waste satellite accumulation containers that were labeled but were not full.

Mr. Benjamin provided me with hazardous waste manifests (manifests) and land disposal restriction forms for 2011 through 2014. After reviewing these manifest records I noted that the transporter signed on behalf of the generator, and that the copies of the manifests signed by the Treatment, Storage and Disposal (TSD) Facility were not present. Mr. Sledge indicated that these copies might be in the office. Mr. Benjamin also provided me with copies of daily inspection records.

As we prepared to exit the hazardous waste storage area we were joined by Mr. Arends. We then proceeded to #T2200 Maintenance Area. Mr. Arends indicated that #T2200 uses reverse logistics for light bulbs and waste paint. He indicated that it takes approximately six to eight months to fill a box of lights bulbs. Mr. Arends indicated that #T220 had one box of waste lamps in storage. I noted that the box was taped shut with duct tape, but not labeled. Mr. Arends then labeled the box as "waste lamps" (see Photograph 6). After labeling the box, Mr. Arends indicated to me that the box in Photograph 6 is then placed into a mailing sleeve (see Photograph 9) and returned via reverse logistics.

Mr. Arends pointed out two other containers of universal waste in the Maintenance Area (see Photographs 7 and 8). These containers were closed, labeled and dated. He indicated that the dating is useful for daily inspections and to indicate that the containers are full. I noted that the date on the container in Photograph 8 had the incorrect year (should be 2013).

We exited the Maintenance Area and entered the Cleaning Crew Closet. Mr. Arends indicated that there was no material in storage, but there was one bin that would go to Mr. Benjamin for ESIM sorting that contained individual bags and ties. He also indicated that the bin is checked on a daily basis.

Mr. Sledge escorted me to the #T2200 Pharmacy and introduced me to Bill Johnson, the Pharmacy Manager. I identified myself to Mr. Benjamin and presented my enforcement credentials. I explained to Mr. Johnson that the purpose of my visit was to conduct an unannounced CEI at #T2200 that included a Records Review as well as a VSI. Mr. Johnson indicated to me that the Pharmacy also follows the EISM sorting system except for hazardous waste pharmaceuticals that are considered Drug Enforcement Agency (DEA) controlled substances that are kept secured in a locked safe (see Photograph 11). I observed two waste accumulation containers that included one hazardous waste satellite accumulation container that was closed and labelled (see Photograph 10).

Mr. Sledge and I left the Pharmacy and proceeded to the offices at the front of the store to review records. I asked Mr. Sledge to point out where #T2200's Hazardous Waste Generator License was posted (see Photograph 12).



During the VSI portion of the CEI, I took twelve photographs with my Canon PowerShot A2500 digital camera, with 16 megapixel resolution. These photographs are attached to this inspection report and are true and representative of the conditions I observed on the date of the CEI.

### **RECORDS REVIEW**

As part of the Records Review I reviewed waste analysis procedures, manifests, land disposal restriction forms and certifications, daily and weekly inspection documentation, Hazardous Waste / ESIM Contingency Plan dated May 2013, Target Corporation's Alert One Emergency Procedures (800-633-1609) revised August 2012 with store specific insert, and electronic training records.

Ms. Pawlak and Mr. Sledge also tried to locate electronic copies of the TSD signed copy of the manifests, but could not locate copies. Later that day, I received a call from Mr. Sledge stating that he had located the electronic copies. The following day I received a call from Wade Miller of Target Corporation indicating that electronic copies of the manifests are stored at each Stores Workbench ESIM intranet web page. He also sent the copies to me electronically.

### **CLOSING CONFERENCE**

At the end of the CEI, I conducted a brief closing conference with Ms. Pawlak and Mr. Sledge. I summarized the observations I had made during the VSI and Record Review. I explained that I would review my notes, checklist and photographs and make a compliance decision in consultation with my management. I also explained that I would send a letter to Target Corporation, along with the inspection report, checklist and photographs. I then concluded the CEI and returned to my vehicle. I departed #T2200 at approximately 9:30 PM CST.

### **Attachment(s)**

Inspection Checklist  
Photographs (12)





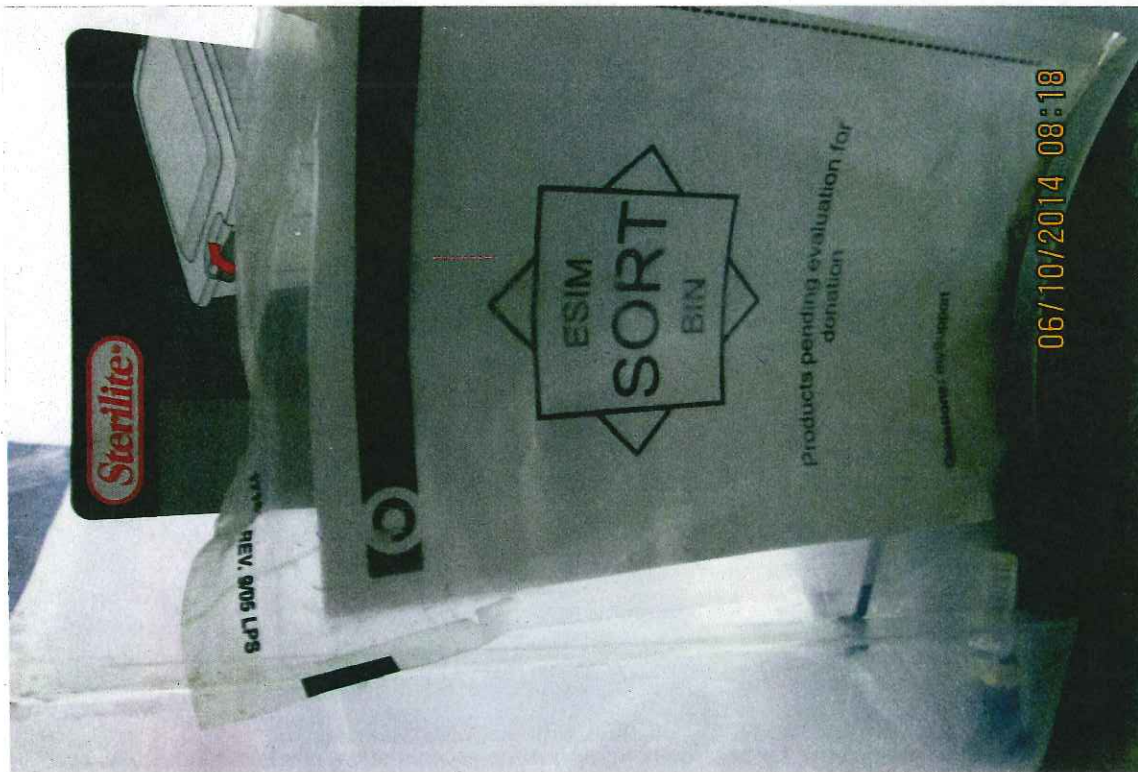
PHOTOGRAPH 1 of 12: Target Store T0068



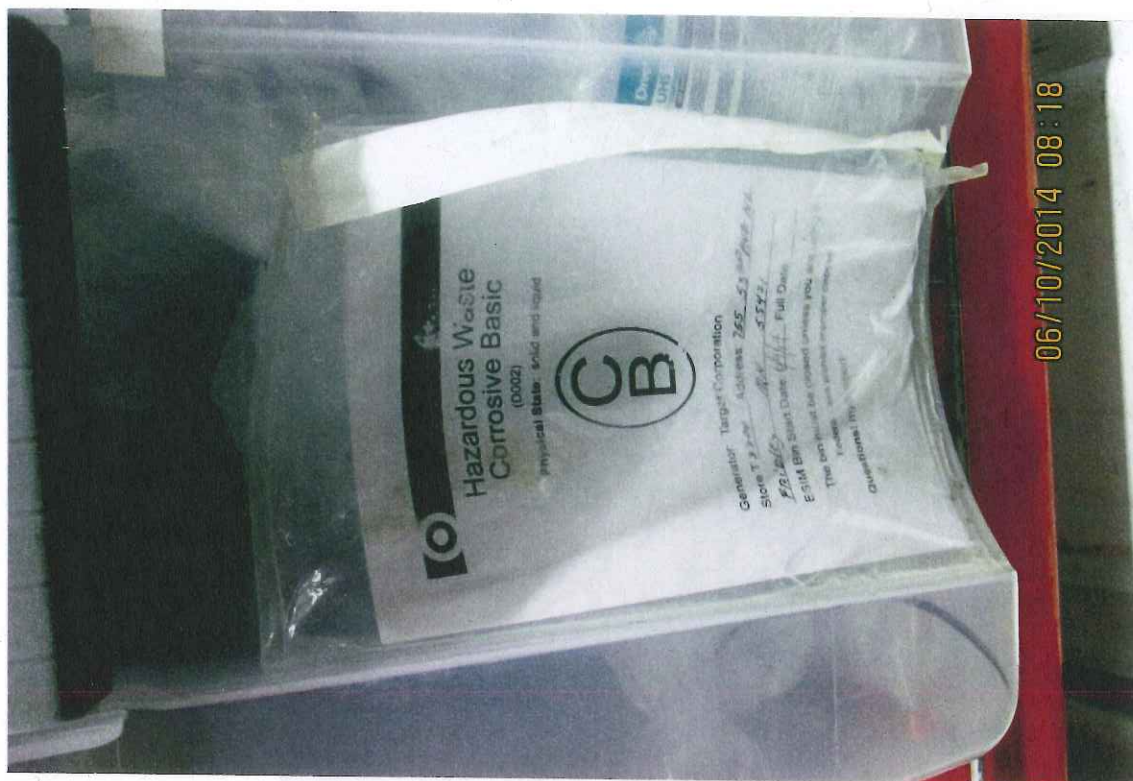
PHOTOGRAPH 2 of 12: Storage Containers (plastic bins) for hazardous waste satellite accumulation, non-hazardous waste and donation.



PHOTOGRAPH 3 of 12: Example of label and bag for items in satellite accumulation container (bin) waiting lab packing.



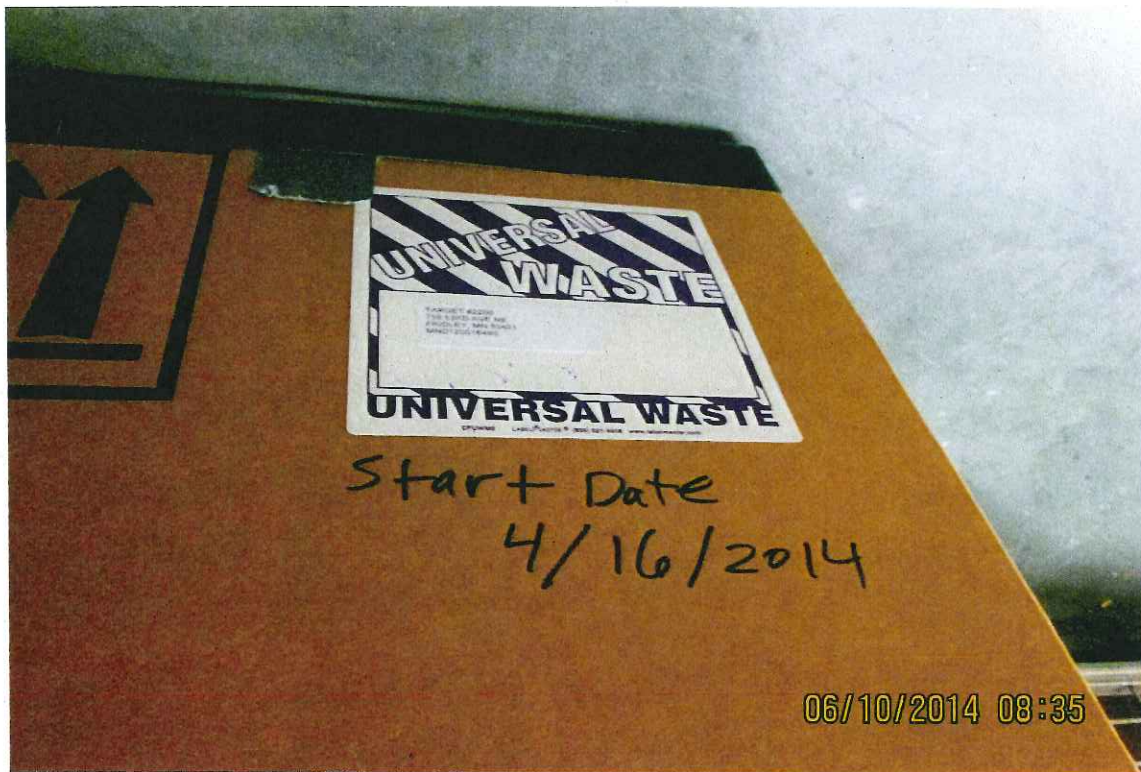
PHOTOGRAPH 4 of 12: Storage Container (bin) pending evaluation for donation.



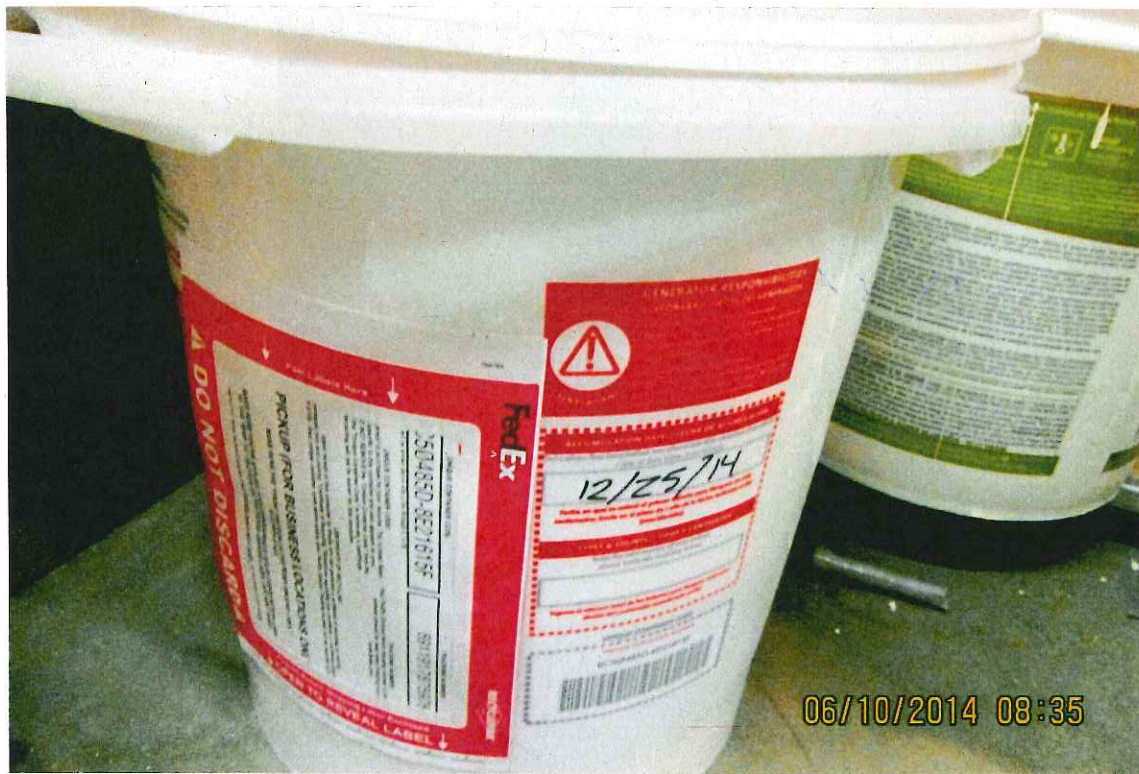
PHOTOGRAPH 5 of 12: Satellite accumulation storage container (bin) for corrosive hazardous waste.



PHOTOGRAPH 6 of 12: Universal Waste Lamps.



PHOTOGRAPH 7 of 12: Universal waste bulbs.



PHOTOGRAPH 8 of 12: Universal waste ballasts with incorrect year (should be 2013).

Target Store T0068, Fridley, Minnesota – EPA ID: MND 120 016 480  
Photographer D. Sharrow with Canon Power Shot A2500 Digital Camera, 16 megapixel resolution.



PHOTOGRAPH 9 of 12: Over pack or outer box for shipping universal waste lamps.



PHOTOGRAPH 10 of 12: Satellite accumulation plastic storage containers for pharmaceutical waste in Target Pharmacy.



PHOTOGRAPH 11 of 12: Locked DEA controlled substances.

**Hazardous Waste Generator License**  
Human Services Division  
Community Health and Environmental Services Department  
Government Center - Ste. 380  
Anoka, MN 55303-5042

License: ANOKA COUNTY  
Est. Name: TARGET CORPORATION  
Address: TARGET CORP STORE 2200  
755 53RD AVE NE  
FRIDLEY, MN 55432

Generator No: 1873  
Lic. No: HW13718  
Est. No: MND120016480  
License Fee: \$3,150.00

As provided by the ordinances of Anoka County, a license is hereby issued to TARGET CORPORATION, as conditioned below, for the operation of an establishment which generates hazardous waste at the location stated herein for the period April 1, 2013, to March 31, 2014, subject to all provisions of the Anoka County Hazardous Waste Ordinance.

Conditions: None

Manager, Environmental Services  
Date Issued: January 2, 2014

**NON-TRANSFERABLE**

PHOTOGRAPH 12 of 12: Anoka County Hazardous Waste Generator License.

# Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID: MND120016480 Regulated Party: Target Store #T2200

Date: 6/10/14 Inspector: D. Sharrow, USEPA

G1: Licensing / EPA / Permits			
Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	yes ✓	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	yes ✓	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	N/A	
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	N/A	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	yes ✓	
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	N/A	
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	No Tanks	
G1: Waste Evaluation			
Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	yes ✓	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	yes Corporate Use of PDATA scan & identify.	

Done  
6/19/14

## G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	✓ yes	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewerage hazardous waste?	N/A	
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	yes ✓	
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	✓ yes	Alert one Rev. 8/2017 Emergency Procedures w/ store specific attached.
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	✓ yes	
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	N/A	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	N/A	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	N/A	
7045.0845	Does the Regulated Party properly manage used oil?	none N/A	
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	N/A	

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### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	N/A	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	N/A	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	N/A	
7045.0990	Is the Regulated Party properly managing used oil filters?	N/A	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	N/A	

### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	✓ yes	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	✓ yes	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	✓ yes	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	✓ yes.	Trained mgs only.

## G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	✓ yes	
7045.0566 4	Is emergency equipment tested and maintained?	✓ yes	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	✓ yes	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	✓ yes	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	N/A	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	N/A	
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	N/A	
7045.0855 2, D	Upon detection of a release of used oil to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	N/A	

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	✓ yes	Bens
7045.0292 1, C	Are hazardous waste <del>containers</del> and tanks labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for <del>non-shipping</del> containers or tanks?	✓ yes	not tanks
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?	✓ No/N.A.	
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	no ✓ outdoor storage	
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	no ✓ free liquids	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	yes ✓	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	yes ✓	
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	yes ✓	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	yes ✓ yes ✓ N/A 2nd part	
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	yes ✓	

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 6	Are incompatible wastes adequately separated?	yes ✓	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	yes ✓	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	yes ✓	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	yes ✓	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	yes ✓	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	N/A	
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	N/A	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	N/A	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	✓ yes	
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	yes ✓	

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	yes ✓	Labeled
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	yes ✓ yes ✓	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	yes ✓	
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	yes ✓	

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 1	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	no ✓	
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	yes ✓	
7045.0265 1, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	yes ✓	
7045.0265 4, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	yes ✓	

MND 120 016480

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	N.A. ✓	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	yes ✓ online	Store Workbench E-SIM Intranet Web Page
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	No Exports	

### G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	✓ ok	

### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	✓ yes	
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	✓ yes	Corporate
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	✓ yes	

### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	✓ yes	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	✓ yes	
7045.0558 6, A	Does the Regulated Party maintain training records which include a job title for each position at the facility related to hazardous waste?	✓ yes	Electronic
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	✓ yes	
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	✓ yes	
7045.0558 6, D	Has the Regulated Party kept records that document that the initial training and annual review training has been given?	✓ yes	
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	✓ yes	

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	✓ yes	
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	✓ yes	

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	yes ✓	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	yes ✓	
7045.0572 4, D	Does the plan include up-to-date name, address and Home and Work phone numbers for emergency coordinators?	yes ✓	
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	yes ✓	
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	yes ✓	
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	yes ✓	
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	yes ✓	
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emerg.eqpt change, process change, emerg. coord. change, plan failed)	yes ✓	